

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MICHAEL SCHILLER, FRANCESCA
FIORENTINI, ROBERT CURLEY, and
NEAL CURLEY,

Plaintiffs

vs.

The CITY OF NEW YORK; RAYMOND
KELLY, Commissioner of the New York City
Police Department; TERENCE MONAHAN,
Assistant Chief of the Bronx Bureau of the New
York City Police Department,

Defendants.
-----X

ECF Case

04 Civ. 7922 (RCS) (JCF)

HACER DINLER; ANN MAURER;
ASHLEY WATERS,

Plaintiffs,

vs.

The CITY OF NEW YORK; RAYMOND W.
KELLY, Commissioner of the New York City
Police Department, and Inspector James Essig,
New York City Police Department

Defendants.
-----X

04 Civ. 7921 (RCS) (JCF)

DECLARATION OF DANIEL MULLKOFF

1. I am an attorney representing the plaintiffs in this matter and submit this declaration in support of the Plaintiffs' Motion for Summary Judgment and the Plaintiffs' Oppositions to the Defendants' Motions for Summary Judgment.
2. I attach as Exhibit A an accurate copy of excerpts of the deposition of Joseph Daniel Amato.
3. I attach as Exhibit B an accurate copy of excerpts of the deposition of Ellen Barfield.

4. I attach as Exhibit C an accurate copy of excerpts of the deposition of David Barrows.
5. I attach as Exhibit D an accurate copy of excerpts of the deposition of Michael Becker.
6. I attach as Exhibit E an accurate copy of excerpts of the deposition of Kathleen Burick.
7. I attach as Exhibit F an accurate copy of excerpts of the deposition of Steve Benjacob.
8. I attach as Exhibit G an accurate copy of excerpts of the deposition of Linnea Capps.
9. I attach as Exhibit H an accurate copy of excerpts of the 50(h) Hearing Transcript of Lauren Caspar.
10. I attach as Exhibit I an accurate copy of excerpts of the deposition of David Cohen.
11. I attach as Exhibit J an accurate copy of excerpts of the deposition of Mark Colville.
12. I attach as Exhibit K an accurate copy of excerpts of the deposition of Jody Concepcion.
13. I attach as Exhibit L an accurate copy of excerpts of the deposition of Patrick Cortright.
14. I attach as Exhibit M an accurate copy of excerpts of the deposition of Neal Curley.
15. I attach as Exhibit N an accurate copy of excerpts of the deposition of Robert Curley.
16. I attach as Exhibit O an accurate copy of excerpts of the deposition of Polly Davies.
17. I attach as Exhibit P an accurate copy of excerpts of the deposition of Felton Davis.
18. I attach as Exhibit Q an accurate copy of excerpts of the deposition of Paul DeEntremont.
19. I attach as Exhibit R an accurate copy of excerpts of the deposition of Peter De Mott.
20. I attach as Exhibit S an accurate copy of excerpts of the deposition of Patrick Devlin.
21. I attach as Exhibit T an accurate copy of excerpts of the deposition of Dewayne Dickerson.
22. I attach as Exhibit U an accurate copy of excerpts of the deposition of Gerald Dieckmann.
23. I attach as Exhibit V an accurate copy of excerpts of the deposition of Lois Doggett.
24. I attach as Exhibit W an accurate copy of excerpts of the deposition of Joseph Dowling.
25. I attach as Exhibit X an accurate copy of excerpts of the deposition of Joseph Esposito.

26. I attach as Exhibit Y an accurate copy of excerpts of the deposition of James Essig.
27. I attach as Exhibit Z an accurate copy of excerpts of the deposition of Adam Feinstein.
28. I attach as Exhibit AA an accurate copy of excerpts of the deposition of Francesca Fiorentini.
29. I attach as Exhibit BB an accurate copy of excerpts of the deposition of Thomas Galati.
30. I attach as Exhibit CC an accurate copy of excerpts of the deposition of Stephen Gamboa.
31. I attach as Exhibit DD an accurate copy of excerpts of the deposition of Tobiah Sucher-Gaster.
32. I attach as Exhibit EE an accurate copy of excerpts of the deposition of Oren Goldenberg.
33. I attach as Exhibit FF an accurate copy of excerpts of the deposition of H. Simon Harak.
34. I attach as Exhibit GG an accurate copy of excerpts of the deposition of Ed Hedemann.
35. I attach as Exhibit HH an accurate copy of excerpts of the deposition of Edward Hotchkiss.
36. I attach as Exhibit II an accurate copy of excerpts of the deposition of Dwight Jenkins.
37. I attach as Exhibit JJ an accurate copy of excerpts of the deposition of Lorenzo Johnson.
38. I attach as Exhibit KK an accurate copy of excerpts of the deposition of Pepper Judd.
39. I attach as Exhibit LL an accurate copy of excerpts of the deposition of Sarah Kanouse.
40. I attach as Exhibit MM an accurate copy of excerpts of the deposition of Jay Kantor.
41. I attach as Exhibit NN an accurate copy of excerpts of the deposition of Annette Karlin.
42. I attach as Exhibit OO an accurate copy of excerpts of the deposition of Brian Kavanagh.
43. I attach as Exhibit PP an accurate copy of excerpts of the deposition of Mark Edward Keegan.
44. I attach as Exhibit QQ an accurate copy of excerpts of the deposition of Ed Kinane.
45. I attach as Exhibit RR an accurate copy of excerpts of the deposition of Katherine Krassan.
46. I attach as Exhibit SS an accurate copy of excerpts of the deposition of Jared Lanctot.

47. I attach as Exhibit TT an accurate copy of excerpts of the 50(h) Hearing Transcript of Josh Lewis.
48. I attach as Exhibit UU an accurate copy of excerpts of the deposition of Marielle Lovecchio.
49. I attach as Exhibit VV an accurate copy of excerpts of the deposition of Celine Malanum.
50. I attach as Exhibit WW an accurate copy of excerpts of the deposition of Ann Maurer.
51. I attach as Exhibit XX an accurate copy of excerpts of the deposition of Terrence Monahan.
52. I attach as Exhibit YY an accurate copy of excerpts of the 50(h) Hearing Transcript of Terrence Monahan.
53. I attach as Exhibit ZZ an accurate copy of excerpts of the deposition of Chris Murray.
54. I attach as Exhibit AAA an accurate copy of excerpts of the deposition of Blossom Nicinski.
55. I attach as Exhibit BBB an accurate copy of excerpts of the deposition of Sean O'Connor.
56. I attach as Exhibit CCC an accurate copy of excerpts of the deposition of Georgianna Page.
57. I attach as Exhibit DDD an accurate copy of excerpts of the deposition of Michael Palmer.
58. I attach as Exhibit EEE an accurate copy of excerpts of the deposition of Christine Pardew.
59. I attach as Exhibit FFF an accurate copy of excerpts of the deposition of Diane Raimondi.
60. I attach as Exhibit GGG an accurate copy of excerpts of the deposition of Brian Rickli.
61. I attach as Exhibit HHH an accurate copy of excerpts of the deposition of Shana Rigby.
62. I attach as Exhibit III an accurate copy of excerpts of the deposition of Anthony Rivers.
63. I attach as Exhibit JJJ an accurate copy of excerpts of the deposition of Rue Sakayama.
64. I attach as Exhibit KKK an accurate copy of excerpts of the deposition of Daniel Sarrubbo.

65. I attach as Exhibit LLL an accurate copy of excerpts of the deposition of Michael Schiller.
66. I attach as Exhibit MMM an accurate copy of excerpts of the deposition of Gordon William Sensiba.
67. I attach as Exhibit NNN an accurate copy of excerpts of the deposition of Dermot Shea.
68. I attach as Exhibit OOO an accurate copy of excerpts of the deposition of James Shea.
69. I attach as Exhibit PPP an accurate copy of excerpts of the deposition of Nicholas Stanich.
70. I attach as Exhibit QQQ an accurate copy of excerpts of the deposition of Jim Steitz.
71. I attach as Exhibit RRR an accurate copy of excerpts of the deposition of William B. Steyert, Jr.
72. I attach as Exhibit SSS an accurate copy of excerpts of the deposition of John Trinkl.
73. I attach as Exhibit TTT an accurate copy of excerpts of the deposition of Frantz Fanon Walker.
74. I attach as Exhibit UUU an accurate copy of excerpts of the deposition of Ashley Waters.
75. I attach as Exhibit VVV an accurate copy of excerpts of the deposition of Adrienne Wilcox
76. I attach as Exhibit WWW an accurate copy of excerpts of the deposition of Daniel Zarrella.
77. I attach as Exhibit XXX an accurate copy of NYPD End User Reports, Bates Nos. 102536, 102549, 102564, 102565, 102566, 102578, 102584, 102585, 102589, 102592, 102593, 102594, 102595, 102596, 102598, 102605, 102614, 102615, 102617, 102618, 102621, 102622, 102626, 102627, 102629, 102632, 102636, 102644, 102651, 102652, 102653, 102655, 102656, 102662, 102663, 102668, 102669, 102676, 102677, 102684, 102690, 102693, 102699, 102705, 102706, 102707, 102719, 102720, 102721, 102725, 102732, 102742, 102761, 102763, 102765, 102780, 102785, 102786, and 102792.
78. I attach as Exhibit YYY an accurate copy of Tom Perotta, "No Charges for 227 Held in Convention Protest," New York Law Journal, Oct. 7, 2004.
79. I attach as Exhibit ZZZ an accurate copy of New York City Police Department, Legal Guidelines for the Republican National Convention," 6 (Mar. 10, 2004).

80. I attach as Exhibit AAAA an accurate copy of *Hankin et al. v. City of Seattle*, No. 2:00-cv-01672, Order Granting Final Approval of Class Settlement (Oct. 27, 2007 W.D. Wa.).
81. I attach as Exhibit BBBB an accurate copy of Memorandum from Inspector Kathy Ryan, QOL Team at 1 (Sept. 14, 2004), Bates No. 156599.
82. I attach as Exhibit CCCC an accurate copy of NYPD Report, Bates Nos. 156713, 156718.
83. I attach as Exhibit DDDD an accurate copy of Memorandum from Commanding Officer, Criminal Justice Bureau to RNC Coordinator (May 4, 2004).
84. I attach as Exhibit EEEE an accurate copy of RNC Arrest Worksheet, Bates No. MAC14001.
85. I attach as Exhibit FFFF an accurate copy of Letter to Raymond Kelly from Christopher Dunn and Donna Lieberman (Oct. 4, 2004).
86. I attach as Exhibit GGGG an accurate copy of Letter to Special Corporation Counsel Gail Donoghue from Christopher Dunn (Oct. 20, 2004).

I declare under penalty of perjury that the foregoing is true and correct.



DANIEL MULLKOFF

Dated: December 21, 2011
New York, N.Y.